

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF DELAWARE

SARA S. ECHEVARRIA,	:	
	:	
Plaintiff,	:	Case No. _____
v.	:	
	:	Removed from Superior Court,
U-HAUL INTERNATIONAL, INC.,	:	New Castle County, Delaware
ROGER MAYFIELD, and	:	C.A. No. 05-03-188 WCC
NATIONWIDE GENERAL INSURANCE	:	
COMPANY,	:	NOTICE OF REMOVAL OF
	:	ACTION UNDER 28 U.S.C. §
Defendants.	:	1441(A)

DEFENDANT U-HAUL INTERNATIONAL INC.'S NOTICE OF REMOVAL

PLEASE TAKE NOTICE that defendant U-Haul International, Inc. ("U-Haul"), by its attorneys, Blank Rome LLP and Quarles & Brady LLP, states as follows in support of the removal of this action:

1. On April 22, 2005, U-Haul was officially served with plaintiff's *Summons* and *Complaint* in an action entitled *Sara S. Echevarria v. U-Haul International, Inc., Roger Mayfield, and Nationwide General Insurance Company*, Superior Court of the State of Delaware, New Castle County, Case No. 05C-03-188 WCC. A copy of these pleadings are attached as Exhibit 1 along with plaintiff's *Notice Pursuant to 10 DEL. C. § 3104, Answers to Form 30 Interrogatories, Verification to Form 30 Interrogatories, Affidavit of Counsel Pursuant to Rule 3(h)(I) and (II) and First Set of Interrogatories to Defendant*. These pleadings and discovery requests constitute all process, pleadings and orders received by U-Haul in this action prior to this Petition for Removal.

2. This Notice of Removal is being filed within thirty (30) days from receipt of the *Summons and Complaint*, and is therefore timely pursuant to 28 U.S.C. §1446(b).

3. According to the Complaint, plaintiff, Sara S. Echevarria, is a resident of the State of Delaware. *See* Plaintiff's Compl. ¶ 1.

4. Defendant, U-Haul, is an Nevada corporation with its principal place of business located at 2721 North Central Avenue, Phoenix, Arizona.

5. According the Complaint, Defendant, Roger Mayfield, is a resident of the State of Florida. *See* Plaintiff's Compl. ¶ 3.

6. As of May 10, 2005, the date of this Removal, Roger Mayfield has not been served in the state proceeding. Upon information and belief, Mayfield is not a citizen of Delaware.

7. Defendant, Nationwide General Insurance Company ("Nationwide"), is an Ohio Corporation with its principal place of business located in Columbus, Ohio.

8. Nationwide, through its authorized representative, has consented to the removal of this action from The Superior Court of the State of Delaware, New Castle County to Federal Court for the Federal District of Delaware.

9. The United States District Court has original jurisdiction over the Summons and Complaint under 28 U.S.C. § 1332(a) as the matter in controversy exceeds \$75,000.00 in value, exclusive of interest and costs, and this action is between citizens of different states. Although plaintiff has not alleged any specific dollar amount in controversy in the Complaint, plaintiff has alleged permanent injuries to her head, eyes, back, left arm, left elbow, hands, bruising, rib pain, concussion, and spinal cord, past and future medical expenses, past and future wage loss, and past and future pain and suffering.

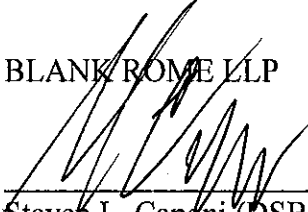
10. Because this Court has original jurisdiction over this action under 28 U.S.C. § 1332(a), this action is removable pursuant to 28 U.S.C. § 1441(a).

11. Written notice of the filing of this Notice of Removal, the exhibits thereto and the Notice of Filing of Notice of Removal was, or will be, given to plaintiff's counsel by hand delivering to them copies thereof this 10th day of May, 2005. A copy of the Notice of Filing of Notice of Removal, which has been or will be filed with the Clerk of the Court of the Superior Court of the State of Delaware, New Castle County, is attached hereto as Exhibit 2.

WHEREFORE, Defendant U-Haul International, Inc. removes this action from the Superior Court of the State of Delaware in and for New Castle County to this honorable Court.

Dated: May 10, 2005.

BLANK ROME LLP



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